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President, CEO

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August 15, 2002

Robert Pernell, Commissioner
Presiding Member
1516 Ninth Street, Mail Stop 26
Sacramento, CA 95814

RE: Docket Number 02-OLS-1
Dear Mr. Pernell:

The International Sign Association (ISA) respectfully submits the following comments on the proposed standards presented in the Outdoor Lighting Research report prepared for the California Energy Commissions by Eley Associates dated June 6, 2002.

ISA is the leading trade association for the on-premise sign industry representing approximately 7,000 manufacturers plus sign user customers. Our members supply on-premise signs and sign products worldwide. For several decades ISA has responded to and provided technical and regulatory leadership on related technical and regulatory issues. We formally request to be part of this proposed standards and rule making process. Please respond in writing and inform us regarding the scope and details of this process.

The sign industry is interested in the efficient use of illumination in outdoor signage to serve our customers' dual needs of communications and cost effectiveness. ISA is concerned by some of the data and claims made in this report, by the failure to contact our association, and by the lack of time afforded for comments to these mandates. ISA's initial position is that this report:

- Fails to examine traffic visibility
- Contains inaccurate and questionable statements
- Is biased towards one type of lighting
- Fails to recognize the need for independent technical research
- Fails to include any review of the economic impact of these mandates
- Is lacking input from the industries this report is seeking to regulate
- Does not contain an impact statement
- Fails to recognize that on-premise business signs are commercial speech subject to important constitutional protections that will severely restrict or prohibit any regulations similar to those being proposed.
- Imposes a new layer of land use controls that will likely be incompatible with the underlying legal use.

In conclusion, ISA requests that this committee postpone any further action until there has been adequate time allowed for industry input and technical studies to be conducted.

Respectfully submitted,

John Johnson, CAE
President and CEO

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